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8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 In re:
12 PG&E CORPORATION,
13 -and-
14 PACIFIC GAS AND ELECTRIC COMPANY,
15 Debtors.

- 16 ☐ Affects PG&E Corporation
17 ☐ Affects Pacific Gas and Electric
Company
18 ☒ Affects both Debtors

19 ** All papers shall be filed in the lead case,*
20 *No. 19-30088 (DM)*

Case No. 19-30088

Chapter 11

Jointly Administered

**NOTICE OF UNRESOLVED OBJECTION
OF DEBRA GRASSGREEN AND KARL
KNIGHT TO CLAIMS RESOLUTION
PROCEDURES**

Related Docket No. [7366][6320]

21
22 Fire Claimants Debra Grassgreen and Karl Knight, on their own behalf and on behalf of their
23 minor son, (the “Knight Family”) hereby provide notice that they have an unresolved objection to
24 the revised draft of the Claims Resolution Procedures (the “CRP”). Claimants filed a timely
25 objection to confirmation of the *Debtors’ and Shareholders Proponents Joint Plan of*
26 *Reorganization Dated March 16, 2020* (the “Plan”) based solely on the waiver in the CRP of the
27 right to any judicial review of the allowance of their claims. (*See* Docket 7366). Subsequently, the
28 Court held that those parties that timely objected to confirmation of the Plan on this basis would

1 retain the right of judicial review. Following such holding, the Knight Family conferred with
2 counsel for the Debtors and counsel for the TCC and confirmed that the Confirmation Order would
3 include language preserving their right of judicial review. On that basis, Karl Knight, who had
4 previously requested to be heard on the matter at the Confirmation Hearing, withdrew his request to
5 be heard on this issue and notified the Court that the objection had been resolved.

6 Following the Confirmation Hearings, we reached out to Counsel for the TCC to ask to
7 review the operative language in the Confirmation Order and trust documents. Following a request
8 to review the trust documents, on Friday, June 12, 2020, the Trustee shared a draft of the revised
9 CRP as a confidential settlement communication. The Knight Family believes that the current
10 version of the CRP is inconsistent with the Court's prior ruling regarding judicial review of claims.
11 The draft CRP was provided under Federal Rule of Evidence 408 and, to date, the TCC and Trustee
12 have not authorized the Knight Family to disclose the objectionable provision. Furthermore, as of
13 the filing of this Notice, the Knight Family has been advised that the CRP has not been finalized and
14 has been modified from the last version that was shared.

15 The Knight Family requests that the Court set a schedule for this limited issue to be presented
16 to the Court within a reasonable time following receipt of the final version of the CRP. *We believe*
17 *that the Court can resolve this dispute between entry of the Confirmation Order and the proposed*
18 *Effective Date and sees no reason for this to delay entry of the Confirmation Order.* The Knight
19 Family is agreeable to using a joint stipulation to present the issue to the Court, subject to
20 confidentiality issues as appropriate in light of the fact that their claim involves a minor.

21
22 Dated: June 15, 2020

23
24 By: Debra Grassgreen and Karl Knight
Debra Grassgreen and Karl Knight